

(710) Broadband Price Offerings Data Collection Form FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<010>	Study Area Code	519905
<015>	Study Area Name	UNION TELEPHONE CO. DBA UNION CELLULAR
<020>	Program Year	2015
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Study Area Code: 518005
Study Area Name: Fremont, WY
Program Year: 2014
Contact Person: Chris Reno
Contact Telephone Number: 307-782-6131
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Carrier Reference Name: Fremont WY-4

TRIBAL ENGAGEMENT NARRATIVE

In accordance with 47 CFR 54.1009 (a)(5) & 54.1004, Union Telephone Company d/b/a Union Wireless ("Union Wireless" or "Company") has engaged and is continuing to engage with representatives of the Northern Arapaho Tribe and the Eastern Shoshone Tribe in order to provide services to the Tribal land network.

I. Needs Assessment and Deployment Planning

Representatives of the Company met, and engaged in substantive discussions, with representatives of the Northern Arapaho Business Council on October 30, 2012. Union Wireless discussed its goal of working with the tribe to ensure adequate coverage, especially for anchor institutions. The Company asked tribal council members to identify geographic areas and anchor institutions that need better coverage. The Company communicated its deployment plans and showed the tribal council members a map showing these plans. (After the meeting, Union Wireless sent the Chairman of the tribal council a PDF map of the Company's coverage areas in the Wind River Reservation overlaid with the roads identified by the FCC as needing service.) The tribal council noted that, for marketing purposes, Union Wireless needs to emphasize lifestyle benefits. Points of contact for Union Wireless and the tribe were designated. The Company noted that it plans to include representatives of the historic preservation offices of the tribes in future tower planning to try to avoid building on cultural sensitive areas.

Representatives of the Company met, and engaged in substantive discussions, with representatives of the Eastern Shoshone Business Council on January 15, 2013. Union Wireless discussed its goal of working with the tribe to ensure adequate coverage, especially for anchor institutions. The Company asked tribal council members to identify geographic areas and anchor institutions that need better coverage. The tribal council identified that coverage in Crowheart is not good, and Union Wireless said that they will work to improve this coverage. Union Wireless also said that they would work with the tribal councils to enhance data coverage in the area of the Boisen Peak Tower. The Company communicated its deployment plans and showed the tribal council members a map showing these plans. The tribal council noted that, for marketing purposes, Union Wireless needs to emphasize lifestyle benefits. Points of contact for Union Wireless and the tribe were designated. The Company noted that it plans to include representative of the historic preservation offices of the tribes in future tower planning to try to avoid building on cultural sensitive areas.

Based on the needs assessments communicated by both tribal business councils, preliminary deployment plans were adjusted to include more extensive upgrades to the Crowheart, Wyoming area and an additional site in Ethete, Wyoming. The enhanced data coverage discussed in the area of the Boisen Peak Tower is outside the targeted unserved areas of census tract 940100 awarded support under the Mobility



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Fund Phase I. Union Wireless will continue to engage in working to deploy an enhanced data solution to this identified underserved area outside the scope of the Mobility Fund Phase I project.

II. Feasibility / Sustainability Planning

The majority of the deployment plans communicated to the Northern Arapaho Business Council on October 30, 2012 and to the Eastern Shoshone Business Council on January 15, 2013 were planned near existing developments to: 1) Serve locations inhabited by permanent residents, 2) Reduce impact to tribal and private assets due to deployment of network infrastructure, 3) Reduce installation and operational costs for each facility.

One facility within the scope of the census tract 940100 Mobility Fund Phase I project is planned to be deployed on privately deed property in an undeveloped location with minimal access to grid power. Solar and wind power are planned to power this site to avoid extensive power lines across pristine tribal wilderness and to minimize impact to any culturally significant sites. The off-grid power sources also help to site the tower location to help provide services to a large area without extensive infrastructure deployment creating long-term sustainable services to the more remote areas of this census tract.

III. Marketing Services in a Culturally Sensitive Manner

Union Wireless is working on a culturally sensitive marketing strategy that focuses on emphasizing the lifestyle benefits as requested by the Eastern Shoshone Business Council. The Company plans to engage with the tribes further about marketing campaigns after the final infrastructure deployments plans are reviewed and deemed to be in accordance to the wishes of the Joint Tribal Business Council representing the Northern Arapaho Business Council and the Eastern Shoshone Business Council.

IV. Processes for: a) Right-Of-Way, b) Land Use Permits, c) Facilities Siting, d) Environmental Reviews

Union Wireless is currently in the process of submitting complete project construction documentation to the Joint Tribal Business Council to address all necessary Right of Way and Land Use Permitting requirements. Please see below for more detail on these processes.

For processes that require approval from the Joint Tribal Business Council representing the Northern Arapaho and the Eastern Shoshone Tribes, all correspondence is directed to the superintendent of the Bureau of Indian Affairs on the Wind River Indian Reservation, the executive secretary of the Northern



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Arapaho Business Council, the executive secretary of the Eastern Shoshone Business Council, and the executive secretary of the Joint Tribal Business Council.

a. Right of Way Processes

For all development within tribal service areas, public record research at the county level has been conducted to determine access requirements to the facility. For leases and easements on deeded lands, including those commencing from Federal, State or county public access roads, the Company negotiates with the landowner(s) of the property. For leases and easements across tribal-owned lands, including those commencing from Federal, State or county public access roads, negotiations take place directly with the Joint Tribal Business Council.

b. Land Use Permitting Requirements

For required land-use permits, approval is sought from the Joint Tribal Business Council in addition to Fremont County and the State of Wyoming when necessary.

c. Facilities Siting Rules

Site location is determined to provide the best coverage area based on the geography of the location as well as from population/area served while not infringing upon known sacred regions. In addition, landownership requirements, power location and access to the site is weighted for time frame construction feasibility. Tribal approval of site location is sought from the Joint Tribal Business Council.

d. Environmental Reviews

Each site, without regard to ownership or jurisdictional requirements, are mandated for environmental review per (47 CFR § 1.1307). Input from Federal, State, Tribal, and Local entities are sought for review as well as public notice and hearings prior to site construction. If required mitigation measures will be implemented.

V. Cultural Preservation Reviews

Prior to site development, cultural studies are implemented from Federal/State agencies or from contracted approved cultural service firms. National Programmatic Agreement (36 CFR § 800.16(b)) guidelines are followed for the cultural review process. From these studies determination of any impact to any cultural, archeological or historical are addressed. The State Historic Preservation Office (SHPO) and Tribal Historic Preservation Office (THPO) review site locations and cultural studies. If no significant cultural impact is found, then concurrence with the study is given. If SHPO or THPO



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determine impact exists, then consultation is addressed at the site location for final determination. Once final concurrence is received site development proceeds.

Of the sites proposed within the bounds of the Wind River Indian Reservation, the facility in Crowheart, Wyoming required new NPA review. The other facilities have already been reviewed and SHPO and THPO concurrence has been obtained and given to the tower owners.

Thru the TCNS process tribal review includes the Apache Tribe of Oklahoma, Cheyenne-Arapaho tribes of Oklahoma, Comanche Nation, Eastern Shoshone Tribe, Fort Peck Tribes, Keweenaw Bay Indian Community, Lower Brule Sioux Tribe, Northern Arapaho Tribe, Northern Cheyenne Tribe, Shoshone-Bannock Tribes, Southern Ute Tribe, Upper Sioux Community of Minnesota and the Ute Indian Tribe.

The Eastern Shoshone Tribe expressed interest in the proposed Crowheart, Wyoming facility and requested phone contact. On January 20, 2014, contact was made with Wilfred Ferris III, Eastern Shoshone Cultural Officer, via phone. Mr. Ferris was informed of the proposed site and had no concerns; however, he requested a representative of the tribe be present during excavation of the tower foundation. This has been added to the project stipulations.

VI. Compliance with Tribal Business and Licensing Requirements

The facilities proposed within the bounds of the Wind River Indian Reservation are in the process of being submitted for tribal business and licensing requirements from the Joint Tribal Business Council representing the Northern Arapaho and the Eastern Shoshone Tribes. All correspondence is directed to the superintendent of the Bureau of Indian Affairs on the Wind River Indian Reservation, the executive secretary of the Northern Arapaho Business Council, the executive secretary of the Eastern Shoshone Business Council, and the executive secretary of the Joint Tribal Business Council.



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PROJECT STATUS DESCRIPTION

SECTION I: DESCRIPTION OF OVERALL PROJECT PLAN

- 3G RNC/MSC/GGSN/SGSN PLUS 4G EPC

In order to launch this system, the necessary 3G and 4G core network needed to be completed and turned operational. This system totals roughly \$3.4 million in network core equipment, which will be shared across all 6 census tracts granted funding to Union Telephone Company in the FCC 901 Mobility Fund.

The core is located in Cheyenne, Wyoming and is fed via dual OC12 networks, giving full redundancy and capacity to support all tower sites related to this project and other network growth on the Union Wireless network. Additional OC12's are already planned as demand increases and also to provide carrier diversity in case of an outage on one particular carriers' network.

STATUS – This portion of the project is complete. Please refer to Section II for more details on the status of the network deployment.

- MIDDLE MILE BACKHAUL

In addition, Union is upgrading its middle mile capabilities in key sections of Wyoming that will allow adequate backhaul facilities to its new 3G and 4G network core.

The first of these upgrades is located in Carbon County, WY between the towns of Hanna and Saratoga. This project connects two new service providers and allow connectivity into several key remote offices within Union Telephone Company's network.

STATUS – This portion of the project is complete. Please refer to Section II for more details on the status of the network deployment.

The second middle mile upgrade was determined to be necessary after 3G/4G deployments in and around the FCC Mobility Fund Phase I deployments starting becoming accessible to consumers. The steep uptake in data services required further upgrades from Rawlins north to the towns of Casper and Riverton to maintain the long-term data speed requirements across all six census tracts as required by fund.



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STATUS – This portion of the project is under construction. Please refer to Section II for more details on the status of the network deployment.

- FREMONT WY-4 (T56013000400) 3G HSPA+

This project consists of two overlays on existing facilities, and two new builds one of which has an existing tower and the other is on private lands. The entire service area in this census tract is on the Wind River Indian Reservation.

TYPE OF BACKHAUL – Union Telephone Company is utilizing leased services when available. We are also using licensed microwave wherever necessary and unlicensed microwave if no available licenses are capable of being obtained. We are targeting at least 25 Mbps of IP backhaul to each cell tower.

SPECTRUM – In this market, we are using a combination of 850 MHz and 1900 MHz to ensure we stay within current CGSA boundaries. All 850 MHz sites fall within existing CGSA boundaries and do not affect existing Union filings, as the intention is to keep GSM fully operational alongside UMTS. The 1900 MHz site actually falls outside of the county of Fremont, therefore would not be possible for any additional 850 MHz spectrum filings, therefore will operate on 1900 MHz as long as it is in operation, with the potential in the future to be modified to 700 MHz for LTE if so needed for capacity.

KEY RISKS OR CHALLENGES - This cluster has the unique challenge in that the eligible miles are on the Wind River Indian Reservation. This presents a unique challenge in that the commercial company does not have to negotiate with only one tribe, but rather two, given the joint management of the Reservation by the Northern Arapahoe and Eastern Shoshone tribes. Given the nature of the region and the expected demand on broadband services for the area, and to ensure enough time to make adequate leasing arrangements, Union Wireless has determined that 4G speeds for this region would be beneficial to the Tribal Members and businesses. This will initially be accomplished using HSPA+ technologies with the option to upgrade, but at the same time Union Wireless will also be deploying LTE technologies, which could also be utilized. This will also afford more time for the Band 12 device interoperability issue to be properly resolved by the FCC and other carriers.

STATUS – This portion of the project is under construction, and we are anticipating to move into deployment phase Q3 and Q4 of 2014. Please refer to Section II for more details on the status of the network deployment.



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Please note that we do show covered road miles despite the fact that the projects targeted to provide the majority of services are still in the construction phase. This is due to ongoing build out of voice and data services being performed by Union Wireless in areas adjacent to the FCC Mobility Fund Phase I eligible areas in order to create a more seamless experience for rural area customers.



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PROJECT STATUS DESCRIPTION

SECTION III: PROJECT BUDGET STATUS

Overlay Sites

- 2 each
 - New hardware Required
 - New Node B Base Station gear \$60,000 each
 - New Microwave gear for IP Backhaul \$150,000 each
 - Upgrades to tower antenna complex \$20,000 each
 - Labor to related projects \$70,000 each

Each overlay site estimated at \$300,000 cost each, total \$600,000 capital contribution

New Sites

- 1 each
 - New hardware Required
 - Tower installation
 - Leasing, zoning, permitting costs \$65,000 each
 - Tower site construction \$75,000 each
 - Tower Steel \$45,000 each
 - Lines, antennas, generators \$50,000 each
 - New Node B Base Station gear \$60,000 each
 - New Microwave gear for IP Backhaul \$50,000 each
 - Upgrades to tower antenna complex \$5,000 each
 - Labor to related projects \$50,000 each

Each overlay site estimated at \$400,000 cost each, for a \$400,000 total capital contribution for new sites. This totals roughly \$1 million in capital costs related to the build out.

Union is projecting incremental operating expenses for this site over 5 years to be \$1.56 million.

BUDGET STATUS –

Total Support Applied to Design/Construction/Deployment (Capital Contribution): **\$458,643.85 – ON BUDGET**



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Total Support Applied to Maintenance: **\$0 – ON BUDGET**